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August 24, 2022

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VIA ECF

The Honorable Edgardo Ramos
United States District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: Craven v. City of New York, and Secreto
Case No.: 1:20-cv-8464 ER
Our File No.: 21160.001

Dear Judge Ramos:

The request for an extension is granted.

SO ORDERED.



Edgardo Ramos, U.S.D.J

Dated: August 25, 2022

New York, New York

We are the attorneys for the Plaintiff, William Craven, in the above-referenced action. We write, with the consent of defense counsel to respectfully request a seven (7)-day extension of time for Plaintiff to file his Second Amended Complaint.

Per this Court's Opinion and Order entered on July 27, 2022 (ECF No. 38), Plaintiff's time to file his Second Amended Complaint is due on August 25, 2022. If this request for extension is granted, Plaintiff's time to file his Second Amended Complaint will be due on September 1, 2022.

The above request is made because Plaintiff's counsel is presently and temporarily understaffed as several key staff members are on leave.

This is Plaintiff's first request for an extension of time to file his Second Amended Complaint and third request for an extension of time in this action. Plaintiff previously requested an extension of time to serve the Summons and Complaint upon Defendants the City of New York and NYPD Chief James Secreto because of technical difficulties, serious health issues of lead counsel, and logistical difficulties from operating remotely (ECF No. 9); and an extension of time to oppose Defendant's Motion to Dismiss the Amended Complaint because Plaintiff's counsel was injured in a car accident and temporarily unable to work (ECF No. 33). This court granted both prior requests for extensions on February 8, 2021 and October 5, 2021 respectively. (ECF Nos. 10, 34).

Honorable Edgardo Ramos

August 24, 2022

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Respectfully submitted,

s/Marshall Bellovin

MARSHALL B. BELLOVIN (MB5508)

Member of the Firm

CC: Joseph Birton Reynolds, Esq. (via ECF)